

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

FILED
JUN 20 2017

U.S. DISTRICT COURT
ELKINS WV 26241

UNITED STATES OF AMERICA,

Plaintiff,

v.

AJARHI SAVIMI ROBERTS, a/k/a
"AJARHI SAVIMBI ROBERTS,"
a/k/a "WAYNE ROBERTS," and
ANGELA DAWN ROBERTS, a/k/a
"ANGELA DAWN LEE,"

Defendants.

Criminal No. 3:17cr50

Violations: 18 U.S.C. § 2
18 U.S.C. § 1028(a)(1)
18 U.S.C. § 1028(a)(3)
18 U.S.C. § 1028(b)
18 U.S.C. § 1028(f)
18 U.S.C. § 1028A
18 U.S.C. § 1344

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Commit Identity Theft)

From on or about March 1, 2016 through on or about January 31, 2017, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly combine, conspire, confederate, and agree with each other to commit offenses in violation of Title 18, United States Code, Section 1028. It was a purpose and object of the conspiracy to produce false identity documents. It was a further purpose and object of the conspiracy to unlawfully possess and use the

names, signatures, dates of birth, Social Security numbers, and driver's license numbers of persons known to the Grand Jury; in violation of Title 18, United States Code, Sections 1028(f) and 1028(b)(1)(D).

COUNT TWO

(Aggravated Identity Theft)

From on or about March 1, 2016 through on or about January 31, 2017, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: conspiracy to commit offenses under 18 U.S.C. § 1028, in violation of 18 U.S.C. § 1028(f), as alleged in Count One of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE

(Unlawful Production of False Identity Document)

On or about June 17, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** aiding and abetting each other did knowingly and without lawful authority produce a false identification document, as defined in Title 18, United States Code, Section 1028(d)(4), that is the defendants produced a Social Security card bearing the name and Social Security number of the first person known to the Grand Jury, and the false identification document appeared to be issued under the authority of the United States; in violation of Title 18, United States Code, Sections 2, 1028(a)(1), 1028(b)(1)(A)(i), 1028(c)(1), and 1028A.

COUNT FOUR

(Aggravated Identity Theft)

On or about June 17, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: unlawful production of a false identity document in violation of 18 U.S.C. § 1028(a)(1) and (b) as alleged in Count Three of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT FIVE

(Unlawful Production of False Identity Document)

On or about June 20, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** aiding and abetting each other did knowingly and without lawful authority produce a false identification document, as defined in Title 18, United States Code, Section 1028(d)(4), that is the defendants produced a Social Security card bearing the name and Social Security number of the second person known to the Grand Jury, and the false identification document appeared to be issued under the authority of the United States; in violation of Title 18, United States Code, Sections 2, 1028(a)(1), 1028(b)(1)(A)(i), 1028(c)(1), and 1028A.

COUNT SIX

(Aggravated Identity Theft)

On or about June 20, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: unlawful production of a false identity document in violation of 18 U.S.C. § 1028(a)(1) and (b) as alleged in Count Five of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT SEVEN

(Unlawful Production of False Identity Document)

On or about June 22, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** aiding and abetting each other did knowingly and without lawful authority produce a false identification document, as defined in Title 18, United States Code, Section 1028(d)(4), that is the defendants produced a Social Security card bearing the name and Social Security number of the third person known to the Grand Jury, and the false identification document appeared to be issued under the authority of the United States; in violation of Title 18, United States Code, Sections 2, 1028(a)(1), 1028(b)(1)(A)(i), 1028(c)(1), and 1028A.

COUNT EIGHT

(Aggravated Identity Theft)

On or about June 22, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: unlawful production of a false identity document in violation of 18 U.S.C. § 1028(a)(1) and (b) as alleged in Count Seven of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT NINE

(Unlawful Production of False Identity Document)

On or about June 27, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** aiding and abetting each other did knowingly and without lawful authority produce a false identity document, as defined in Title 18, United States Code, Section 1028(d)(4), that is the defendants produced a West Virginia driver license, more fully described as a West Virginia driver license bearing the name and driver's license number of the fourth person known to the Grand Jury, and the production of the false identity document was in and affected interstate commerce; in violation of Title 18, United States Code, Sections 2, 1028(a)(1), 1028(b)(1)(A)(ii), 1028(c)(3)(A), and 1028A.

COUNT TEN

(Aggravated Identity Theft)

On or about June 27, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: unlawful production of a false identity document in violation of 18 U.S.C. § 1028(a)(1) and (b) as alleged in Count Nine of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT ELEVEN

(Unlawful Production of False Identity Document)

On or about June 28, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** aiding and abetting each other did knowingly and without lawful authority produce a false identification document, as defined in Title 18, United States Code, Section 1028(d)(4), that is the defendants produced a Social Security card bearing the name and Social Security number of the fifth person known to the Grand Jury, and the false identification document appeared to be issued under the authority of the United States; in violation of Title 18, United States Code, Sections 2, 1028(a)(1), 1028(b)(1)(A)(i), 1028(c)(1), and 1028A.

COUNT TWELVE

(Aggravated Identity Theft)

On or about June 28, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** aiding and abetting each other did knowingly possess, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: unlawful production of a false identity document in violation of 18 U.S.C. § 1028(a)(1) and (b) as alleged in Count Eleven of this Indictment, which is hereby incorporated by reference as if fully stated herein; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THIRTEEN

(Identity Theft)

On or about June 27, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** aiding and abetting each other did knowingly possess in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit, the name, signature, address, date of birth, and West Virginia commercial driver's license number of the sixth person known to the Grand Jury, knowing that the means of identification belonged to another actual person, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, bank fraud in violation of 18 U.S.C. § 1344(1); in violation of Title 18, United States Code Sections 2, 1028(a)(7), 1028(b)(2)(B), and 1028(c)(3)(A).

COUNT FOURTEEN

(Identity Theft)

On or about June 27, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** aiding and abetting each other did knowingly possess in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit, the name, signature, address, date of birth, and West Virginia driver's license number of the seventh person known to the Grand Jury, knowing that the means of identification belonged to another actual person, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, bank fraud in violation of 18 U.S.C. § 1344(1); in violation of Title 18, United States Code Sections 2, 1028(a)(7), 1028(b)(2)(B), and 1028(c)(3)(A).

COUNT FIFTEEN

(Bank Fraud)

1. At all times relevant hereto, the defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.
2. Capital One, N.A. is a financial institution as defined in Title 18, United States Code, Section 20.
3. On or about March 1, 2016, defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain money from Capital One.
4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.
5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 17, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly execute such scheme and artifice to defraud a financial institution by the defendant **ANGELA DAWN ROBERTS** accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, address, driver's license number, and copy of driver's license of the first person known to the Grand Jury, transferring that information to the defendant **AJARHI SAVIMI ROBERTS** who then used that information to

apply for a Capital One credit card in the name of the first person known to the Grand Jury; in violation of Title 18, United States Code, Section 1344(1).

COUNT SIXTEEN

(Aggravated Identity Theft)

On or about June 17, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Fifteen of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT SEVENTEEN

(Bank Fraud)

1. At all times relevant hereto, the defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.
2. Bank of America, N.A. is a financial institution as defined in Title 18, United States Code, Section 20.
3. On or about March 1, 2017, defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain approximately \$6,500 from Bank of America.
4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.
5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 17, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly execute such scheme and artifice by the defendant **ANGELA DAWN ROBERTS** accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, and address of the eighth person known to the Grand Jury, transferring that information to the defendant **AJARHI SAVIMI ROBERTS** who then used that information to obtain and negotiate a Bank of America access check in the name of the eighth person

known to the Grand Jury in the amount of \$6,500 for account number ending in 9369; in violation of Title 18, United States Code, Section 1344(1).

COUNT EIGHTEEN

(Aggravated Identity Theft)

On or about June 17, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Seventeen of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT NINETEEN

(Bank Fraud)

1. At all times relevant hereto, the defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.
2. Discover Bank is a financial institution as defined in Title 18, United States Code, Section 20.
3. On an exact date not known to the Grand Jury, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain a credit card from Discover Bank.
4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.
5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 20, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly attempt to execute such scheme and artifice to defraud a financial institution by the defendant **ANGELA DAWN ROBERTS** accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, and address of the second person known to the Grand Jury, transferring that information to the defendant **AJARHI SAVIMI ROBERTS**, who then used that information to apply for a Discover It card from Discover

Bank in the name of the second person known to the Grand Jury; in violation of Title 18, United States Code, Section 1344(1).

COUNT TWENTY

(Aggravated Identity Theft)

On or about June 20, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Nineteen of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT TWENTY-ONE

(Bank Fraud)

1. At all times relevant hereto, the defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.
2. Chase Bank USA, N.A. is a financial institution as defined in Title 18, United States Code, Section 20.
3. On or about March 1, 2016, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain a credit card from Chase Bank.
4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.
5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 20, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly attempt to execute such scheme and artifice to defraud a financial institution by accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, and address of the second person known to the Grand Jury, transferring that information to the defendant **AJARHI SAVIMI ROBERTS** who then used that information to apply for a Chase Freedom Visa Signature credit card in the name of the second person

known to the Grand Jury; in violation of Title 18, United States Code, Section 1344(1).

COUNT TWENTY-TWO

(Aggravated Identity Theft)

On or about June 20, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Twenty-One of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT TWENTY-THREE

(Bank Fraud)

1. At all times relevant hereto, the defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.

2. Chase Bank USA, N.A. is a financial institution as defined in Title 18, United States Code, Section 20.

3. On or about March 1, 2016, defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain approximately \$12,400 from Chase Bank.

4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.

5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 22, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly execute such scheme and artifice to defraud a financial institution by accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, and address of the third person known to the Grand Jury, transferring that information to the defendant **AJARHI SAVIMI ROBERTS** who then used that information to apply for and obtain a Chase Freedom Unlimited credit card with a \$12,400 line of credit for account number

ending in 4917 in the name of the third person known to the Grand Jury; in violation of Title 18, United States Code, Section 1344(1).

COUNT TWENTY-FOUR

(Aggravated Identity Theft)

On or about June 22, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Twenty-Three of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT TWENTY-FIVE

(Bank Fraud)

1. Defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.
2. Citibank, N.A. is a financial institution as defined in Title 18, United States Code, Section 20.
3. On or about March 1, 2016, defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain a credit card from Citibank.
4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.
5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 22, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly attempt to execute such scheme and artifice to defraud a financial institution by the defendant **ANGELA DAWN ROBERTS** accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, and address of the ninth person known to the Grand Jury, transferring that information to the defendant **AJARHI SAVIMI ROBERTS** who then used that information to apply for a Citi Double Cash MasterCard

credit card in the name of the ninth person known to the Grand Jury; in violation of Title 18, United States Code, Section 1344(1).

COUNT TWENTY-SIX

(Aggravated Identity Theft)

On or about June 22, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Twenty-Five of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT TWENTY-SEVEN

(Bank Fraud)

1. At all times relevant hereto, the defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.

2. Capital One, N.A. is a financial institution as defined in Title 18, United States Code, Section 20.

3. On or about March 1, 2016, defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain a credit card from Capital One.

4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.

5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 22, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly attempt to execute such scheme and artifice by accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, and address of the ninth person known to the Grand Jury, transferring that information to the defendant **AJARHI SAVIMI ROBERTS** who then used that information to apply for a Capital One credit card in the name of the ninth person known to the Grand Jury; in violation of Title 18, United States Code, Section 1344(1).

COUNT TWENTY-EIGHT

(Aggravated Identity Theft)

On or about June 22, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Twenty-Seven of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT TWENTY-NINE

(Bank Fraud)

1. At all times relevant hereto, the defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.
2. Bank of America, N.A. is a financial institution as defined in Title 18, United States Code, Section 20.
3. On or about March 1, 2017, defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain approximately \$7,000 from Bank of America.
4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.
5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 22, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly execute such scheme and artifice by the defendant **ANGELA DAWN ROBERTS** accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, and address of the ninth person known to the Grand Jury, transferring that information to the defendant **AJARHI SAVIMI ROBERTS** who then used that information to apply for a Bank Americard Cash Rewards credit card with a \$7,000 line of credit for

account number ending in 9763 in the name of the ninth person known to the Grand Jury; in violation of Title 18, United States Code, Section 1344(1).

COUNT THIRTY

(Aggravated Identity Theft)

On or about June 22, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Twenty-Nine of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THIRTY-ONE

(Bank Fraud)

1. At all relevant times hereto, the defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.

2. Barclays Bank Delaware is a financial institution as defined in Title 18, United States Code, Section 20.

3. On March 1, 2016, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain a credit card from Barclay.

4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.

5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 23, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly attempt to execute such scheme and artifice to defraud a financial institution by the defendant **ANGELA DAWN ROBERTS** accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, and address of the tenth person known to the Grand Jury, transferring that information to the defendant **AJARHI SAVIMI ROBERTS** who then used that information to apply for a Barclaycard Arrival Plus

MasterCard in the name of the tenth person known to the Grand Jury; in violation of Title 18, United States Code, Section 1344(1).

COUNT THIRTY-TWO

(Aggravated Identity Theft)

On or about June 23, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Thirty-One of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THIRTY-THREE

(Bank Fraud)

1. At all times relevant hereto, the defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.
2. Wells Fargo Bank, N.A. is a financial institution as defined in Title 18, United States Code, Section 20.
3. On or about March 1, 2016, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain approximately \$8,000 from Wells Fargo.
4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.
5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 27, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly execute such scheme and artifice to defraud a financial institution by accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, address, driver's license number, and copy of driver's license of the fourth person known to the Grand Jury and transferring that information to the defendant **AJARHI SAVIMI ROBERTS** who then used that information to obtain a Wells Fargo Visa Signature Card with an \$8,000 line of credit for account ending in 8617 in the name of the fourth

person known to the Grand Jury; in violation of Title 18, United States Code,
Section 1344(1).

COUNT THIRTY-FOUR

(Aggravated Identity Theft)

Between on or about June 27, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Thirty-Three of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THIRTY-FIVE

(Bank Fraud)

1. At all times relevant hereto, the defendant **ANGELA DAWN ROBERTS** was employed at WVU Medicine University Healthcare in Martinsburg, West Virginia.
2. Bank of America, N.A. is a financial institution as defined in Title 18, United States Code, Section 20.
3. On or about March 1, 2016, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** devised a scheme and artifice to defraud a financial institution, through which the defendant **AJARHI SAVIMI ROBERTS** intended to obtain approximately \$6,000 from Bank of America.
4. It was a part of the scheme and artifice that the defendant **ANGELA DAWN ROBERTS** would access WVU Medicine University Healthcare's patient database to obtain names, dates of birth, Social Security numbers, addresses, and driver's license numbers.
5. While accessing the patient database, the defendant **ANGELA DAWN ROBERTS** wrote the patient's personal identifying information on sheets of paper and printed a copy of the patient's driver's license, when available.

6. After recording the personal identifying information, the defendant **ANGELA DAWN ROBERTS** transferred the information to the defendant **AJARHI SAVIMI ROBERTS**.

7. The defendant **AJARHI SAVIMI ROBERTS** used the personal identifying information to open credit card and other financial accounts in the patient's name.

8. It was further a part of the scheme and artifice that the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** misrepresented and concealed material facts regarding the true nature and identity of **AJARHI SAVIMI ROBERTS**.

9. On or about June 27, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly execute such scheme and artifice to defraud a financial institution by accessing WVU Medicine University Healthcare's patient database and obtaining the name, date of birth, Social Security number, address, driver's license number, and copy of driver's license of the fourth person known to the Grand Jury and transferring that information to the defendant **AJARHI SAVIMI ROBERTS** who then used that information to obtain a BankAmericard Cash Rewards credit card with a \$6,000 line of credit for account number ending in 0351 in the name of

the fourth person known to the Grand Jury; in violation of Title 18, United States Code, Section 1344(1).

COUNT THIRTY-SIX

(Aggravated Identity Theft)

On or about June 27, 2016, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **AJARHI SAVIMI ROBERTS** and **ANGELA DAWN ROBERTS** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count Thirty-Five of this Indictment, which is hereby incorporated by reference as if fully stated herein, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION

(Identity Theft)

1. Pursuant to Title 18, United States Code, Section 982(a)(2)(B), the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property constituting, or derived from, proceeds obtained directly, or indirectly as a result of a violation of Title 18, United States Code, Section 1028, or a conspiracy to violate such offense, including a money judgment in the amount of at least \$13,085.65.

2. Pursuant to Title 18, United States Code, Section 982(b)(1), Title 28, United States Code, Section 2461(c), the government will seek forfeiture of substitute property up to the value of property subject to direct forfeiture that is not available for forfeiture on account of any act or omission contemplated by Title 21, United States Code, Section 853(p)(1).

A true bill,

/s/ _____
Foreperson

/s/ _____
Betsy Steinfeld Jividen
Acting United States Attorney

Lara K. Omph-Botteicher
Assistant United States Attorney